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14
15 **UNITED STATES DISTRICT COURT**
16
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 INTEL CORPORATION and APPLE INC.,

19 Plaintiffs,

20 v.

21 FORTRESS INVESTMENT GROUP LLC,
22 FORTRESS CREDIT CO. LLC, UNILOC
23 2017 LLC, UNILOC USA, INC., UNILOC
24 LUXEMBOURG S.A.R.L., VLSI
25 TECHNOLOGY LLC, INVT SPE LLC,
26 INVENTERGY GLOBAL, INC., and IXI IP,
27 LLC,

28 Defendants.

Case No. 3:19-cv-07651-EMC

29
30 **DECLARATION OF CHRISTOPHER A.
31 SEIDL IN SUPPORT OF DEFENDANTS
32 INVT SPE LLC AND INVENTERGY
33 GLOBAL, INC.’S ADMINISTRATIVE
34 MOTION TO SEAL**

35 Hon. Edward M. Chen

1 I, Christopher A. Seidl, hereby state:

2 1. I am an attorney at law and partner of the law firm Robins Kaplan LLP, attorneys
 3 for Defendants INVT SPE LLC (“INVT”) and Inventergy Global, Inc. (“Inventergy”) in the
 4 above-referenced action. The following statements are based on my own personal knowledge, and
 5 if called as a witness, I could testify thereto.

6 2. Pursuant to Civil Local Rule 79-5, I make this declaration in support of Defendants
 7 INVT SPE LLC and Inventergy Global, Inc.’s Supplemental Brief in Support of Defendants Joint
 8 Motion to Dismiss and to Strike Plaintiffs’ Second Amended Complaint (“Supplemental Brief”)
 9 and certain exhibits to the Declaration of Christopher A. Seidl (“Seidl Decl.”).

10 3. Specifically, INVT and Inventergy seek an order sealing the following materials:

Document	Portions to Be Filed Under Seal
Supplemental Brief	Page 2, lines 12-13, 14-15, 24-page 3, lines 1, 2-4, 6-7, 7-9, 10-14, figure at lines 15-20, lines 21-22, figure at lines 23-27, page 4, lines 1-3
Exhibit 24 to the Seidl Decl.	In its entirety
Exhibit 25 to the Seidl Decl.	In its entirety

16 4. INVT and Inventergy file this motion because the concurrently filed Supplemental
 17 Brief and certain corresponding exhibits to the Seidl Decl. contain information that is “privileged,
 18 protectable as a trade secret or otherwise entitled to protection under the law.” Civil L.R. 79-5(b).

19 5. The requested relief is necessary and narrowly tailored to protect the confidentiality
 20 of the materials and information used in support of INVT and Inventergy’s Supplemental Brief.
 21 Additionally, there is both “good cause” and “compelling reasons” in the present matter to rebut
 22 the presumption of access to judicial records. *Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092,
 23 1101 (9th Cir. 2016) (discussing “good cause” and “compelling reasons” standards with respect to
 24 the merits of the motion to the underlying case). Sealing is proper as the aforementioned
 25 documents contain information relating to INVT and Inventergy’s financial information, as well as
 26 business strategies and negotiations, which are all protectable as trade secrets. Indeed, this Court

1 previously sealed portions of earlier versions of Plaintiffs' complaint that referenced the letters
2 and information INVT and Invenergy seek to seal. Dkt. 238.

3 I declare that the foregoing is true and correct.

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1 Dated: April 26, 2021

Respectfully submitted,

2 ROBINS KAPLAN LLP

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